


DOCKET NO.: NNH-CV17-6072389-S	:	SUPERIOR COURT
	:	
ELIYAHU MIRLIS	:	J. D. OF NEW HAVEN
	:	
v.	:	AT NEW HAVEN
	:	
YESHIVA OF NEW HAVEN, INC.	:	MARCH 4, 2020
FKA THE GAN, INC. FKA THE GAN	:	
SCHOOL, TIKVAH HIGH SCHOOL AND	:	
YESHIVA OF NEW HAVEN, INC.	:	

AFFIDAVIT OF ATTORNEYS' FEES

STATE OF CONNECTICUT)	
) ss.	Bridgeport
COUNTY OF FAIRFIELD)	

I, John L. Cesaroni, after being duly sworn, hereby depose and say:

1. I am over 18 years of age and understand the obligations of an oath.
2. I am an associate with Zeisler & Zeisler, P.C., counsel to the plaintiff, Eliyahu Mirlis (the "Plaintiff"), in the above-captioned consolidated foreclosure actions. I have actively represented this party and as such I have personal knowledge of the facts attested to herein.
3. The Plaintiff incurred attorneys' fees in the amount of \$34,614.50 due to Zeisler & Zeisler, P.C. for services performed by partner Matthew K. Beatman and me, in connection with the instant proceedings against the defendant, Yeshiva of New Haven, Inc., to foreclose upon the Plaintiff's lien on the Defendant's interest in the property known as 765 Elm Street, New Haven, Connecticut.
4. A detailed description of the attorneys' fees incurred by the Plaintiff in the collection of the debt owed to it, including the litigation of this action is attached to this affidavit as **Exhibit A**.



John L. Cesaroni

Subscribed and sworn to before me this 4th day of March, 2020.



Notary Public
My commission expires:

Gina Marie Fourtin
NOTARY PUBLIC
State of Connecticut
My Commission Expires 5/31/2021



EXHIBIT A

	A	B	C	D	E	F	G
1	Client:	13118	Mirlis, Eliyahu				
2	Matter:	0	v. Daniel Greer/Yeshiva School				
3							
4	Matter	Date	Timekeeper	Hours	Rate	Amount	Narrative
5	0	7/15/2017	JLC	1.00	300.00	300.00	Draft foreclosure complaint re 765 Elm
6	0	7/17/2017	JLC	0.50	300.00	150.00	Continue drafting foreclosure complaints and notices of lis pendens; call to A. Ponvert re same
7	0	7/18/2017	JLC	0.80	300.00	240.00	Continue drafting foreclosure complaints and notices of lis pendens; call with A. Ponvert re same; call with H. Brown re 765 Elm; planning and strategy re execution and foreclosures
8	0	7/19/2017	JLC	0.20	300.00	60.00	Attention to service of foreclosure complaints and lis pendens
9	0	7/20/2017	JLC	0.20	300.00	60.00	Call to M. Holtberg re 765 Elm property
10	0	9/26/2017	JLC	0.20	300.00	60.00	Draft motion for default
11	0	9/27/2017	MKB	0.10	425.00	42.50	Review correspondence from Attorney McNair re: answers.
12	0	9/28/2017	JLC	0.10	300.00	120.00	Review answer re foreclosure actions
13	0	10/17/2017	JLC	2.50	300.00	750.00	Draft motion for summary judgment
14	0	1/16/2018	JMK	1.00	300.00	300.00	Attend hearings on motions for summary judgment; prepare for same
15	0	3/13/2019	JLC	1.00	335.00	335.00	Draft request for inspection of Yeshiva; legal research re same
16	0	3/22/2019	JLC	0.30	335.00	100.50	Review objection to request to inspect Yeshiva
17	0	4/5/2019	JLC	0.60	335.00	201.00	Draft reply to objection to request to inspect
18	0	4/9/2019	JLC	0.20	335.00	67.00	Review order re inspection of Yeshiva; email correspondence with J.
19	0	4/10/2019	JLC	0.50	335.00	167.50	Email correspondence with P. Craffey re appraisal; planning and strategy re same
20	0	4/12/2019	JLC	0.40	335.00	134.00	Email correspondence with P. Craffey re appraisal; email correspondence with J. Sklarz re same; review motion to extend
21	0	5/15/2019	JLC	0.20	335.00	67.00	Email correspondence with P. Craffey re appraisal
22	0	6/4/2019	JLC	2.00	335.00	670.00	Call with P. Craffey re appraisal; call with client re same; draft motion for judgment, affidavit of debt, affidavit of attorneys fees, oath of
23	0	6/12/2019	JLC	0.50	335.00	167.50	Review objection to motion for judgment; email correspondence with client re offer on Yeshiva and motion for judgment
24	0	6/13/2019	JLC	0.70	335.00	234.50	Review affidavit of debt from client; finalize affidavit of attorneys' fees
25	0	6/17/2019	JLC	1.50	335.00	502.50	Attend hearing re motion for judgment prepare for same
26	0	7/24/2019	JLC	0.70	335.00	234.50	Email correspondence with J. Sklarz re depositions; call with P. Craffey re same; review motions to quash subpoenas
27	0	9/25/2019	JLC	1.50	335.00	502.50	Legal research re collection of bond; planning and strategy re valuation hearing
28	0	9/27/2019	JLC	3.00	335.00	1005.00	Email correspondence with P. Craffey re deposition; email correspondence with J. Sklarz re depositions; prepare for expert depositions
29	0	9/29/2019	JLC	0.40	335.00	134.00	Call with J. Sklarz re expert depositions
30	0	10/7/2019	JLC	2.40	335.00	804.00	Prepare for depositions of experts
31	0	10/8/2019	JLC	1.40	335.00	469.00	Email correspondence with J. Sklarz re depositions; email
32	0	10/9/2019	JLC	3.20	335.00	1072.00	Prepare for deposition of P. Craffey
33	0	10/10/2019	JLC	7.50	335.00	2512.50	Deposition of P. Craffey; prepare for same
34	0	10/15/2019	JLC	3.20	335.00	1072.00	Draft objection to motion to continue valuation hearing; prepare for depositions of Yeshiva experts
35	0	10/16/2019	JLC	6.50	335.00	2177.50	Prepare for depositions of Yeshiva experts; call with J. Sklarz re
36	0	10/17/2019	JLC	8.00	335.00	2680.00	Depositions of P. Wellspeak and D. Jones
37	0	10/22/2019	JLC	3.50	335.00	1172.50	Prepare for meeting with P. Craffey re valuation hearing
38	0	10/23/2019	JLC	3.80	335.00	1273.00	Continue to prepare for meeting with P. Craffey re valuation hearing
39	0	10/24/2019	JLC	6.50	335.00	2177.50	Meeting with P. Craffey re hearing preparation; prepare for meeting
40	0	10/25/2019	JLC	2.70	335.00	904.50	Prepare for valuation hearing; review erratta and jurat re P. Craffey
41	0	10/27/2019	JLC	2.50	335.00	837.50	Prepare for valuation hearing
42	0	10/28/2019	JLC	6.50	335.00	2177.50	Attend valuation hearing; prepare for same
43	0	12/8/2019	JLC	3.50	335.00	1172.50	Prepare for valuation hearing
44	0	12/9/2020	JLC	3.50	335.00	1172.50	Attend valuation hearing; prepare for same
45	0	1/20/2020	JLC	2.80	350.00	980.00	Review transcripts of valuation hearing re post-hearing brief
46	0	1/22/2020	JLC	1.50	350.00	525.00	Draft post-hearing brief; legal research re same
47	0	1/24/2020	JLC	2.50	350.00	875.00	Draft posthearing brief; legal research re same
48	0	1/26/2020	JLC	5.40	350.00	1890.00	Continue to draft posthearing brief
49	0	1/27/2020	JLC	3.80	350.00	1330.00	Continue to draft post-hearing brief and prepare exhibits; review
50	0	2/26/2020	JLC	0.80	350.00	280.00	Review memo of decision re valuation; call with client re same
51	0	3/2/2020	JLC	0.50	350.00	175.00	Draft updated affidavit of debt; email correspondence with client re
52	0	3/4/2020	JLC	0.80	350.00	280.00	Prepare updated affidavit of attorneys' fees; prepare updated
53				102.90		\$ 34,614.50	